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January 24, 2011

Hon. Mag. Patty Shwartz
United States District Court
50 Walnut Street
U.S. Post Office & Courthouse
Newark, NJ 07102

Re: Pantoja v. City of Hoboken, et al; Docket No. 07-cv-5113 (SRC)(MAS);

Garden State Mun. Joint Ins. Fund v. ACE Illinois Union Ins. Co., et al; Docket No. 10-cv-02036 (KSH)(PAS)

Your Honor:

This firm represents the Plaintiffs in the Pantoja matter referenced above. I am in receipt of an email from Mr. Sciarra (received this afternoon) concerning his client, Mr. Andriani, and confirming that Mr. Andriani has agreed to waive any and all claims he has or may have against the Plaintiffs in the Pantoja matter, in exchange for a release of any and all claims said Plaintiffs had or may have against him.

On the condition that Mr. Andriani in fact has agreed to enter into a settlement agreement with a provision providing a global release of any and all claims he has against the Plaintiffs in the Pantoja matter, we take no position with the fact that Mr. Andriani will not attend the hearing tomorrow. However, we respectfully request that the Court order that Mr. Andriani be made telephonically available during the hearing tomorrow, so that the Court can directly speak with him to resolve any ambiguities that may arise and/or to record his consent and agreement to a provision releasing Plaintiffs from any and all claims he had or may have against Plaintiffs (up to the execution of an agreement between them).

Respectfully submitted,

Adam J. Kleinfeldt

cc: All counsel of record via electronic filing.

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